IO24621



October 31, 2012

Document Processing Desk 6(a)(2)
Office of Pesticide Programs – 7504P
U.S. Environmental Protection Agency
Ariel Ross Building
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

RE: Section 6(a)(2) September Incident Filing

Dear 6(a)(2) Administrator:

On behalf of Reckitt Benckiser, Scientific & Regulatory Consultants, Inc. (SRC) is submitting the enclosed documents containing alleged adverse effect incidents for products listed below. SafetyCall is the primary gathering source for incidents, though internal reports for infrequent calls/correspondence received directly at Reckitt Benckiser are also included. SRC is acting on Reckitt Benckiser's behalf by assisting them in registration actions and their reporting requirements under the 6(a)(2) rule.

The EPA Registration Numbers with adverse effect incidents for this report are:

- 3282-81
- 777-81
- 3282-74
- 777-83
- 777-117
- 777-99

These incidents are being reported in compliance with 40 CFR § 159.184 and have been assigned the H-C severity classification. If additional information is needed, please feel free to contact us by e-mail (bmacdonald@srcconsultants.com) or akline@srcconsultants.com) or by phone at 260-244-6270.

Sincerely,

Bob MacDonald Consultant (SRC)

Agent for Reckitt Benckiser

Bet Mordendl

Ann M. Kline Consultant (SRC)

Agent for Reckitt Benckiser

Jun M. Kline

Phone: 260-244-6270 Fax: 260-244-6273

000000

0

09/25/2012 12:47:02 Reckitt Benckiser Page 1

SUMMARY INCIDENT

EPA REG. #: 3282-81 UPDATE 11

215:45 Incident Number: C240321210 Date Entered: 09/05/2012

Entered By: Event Date: 09/04/2012 Sheila Kealy

Assigned To: Status: Pending Sheila Kealy

Origin: Fax Date Closed:

FollowUp Date: 12/04/2012 Closed By: Country: USA Contact Type: Consumer

000000 DETAILS OF INCIDENT - PRODUCT 1 of 1

Lot Code:

No. Involved Regular User: No

1920000202 d-CON Ready Mixed Bait Bits, 3 oz. 4-Pk Product:

Skin Irritation (Non-Descrip) Reason:

Alt Reason: Investigation:

Priority: Priority 3 Price: \$4.87

Factory: Not Factory Related

Sample Sent: Sample Received:

Summary Comments:

INVESTIGATION DETAILS

Investigated By:

Causality:

Expect Resp to CST:

Found Reason:

Cause:

Corrective Action:

Investigation Date: Sample Recyd Date: Date of Resp to CST:

Complaint Reas Correct: Medical Substantiated:

STORE DETAILS

Store:

NAWALMART

Location:

Carson City

Postcode:

89701

REVIEWED FOR 6(a)2

HC

MEMO DETAILS

DATE: 10.29.12 INITIALS: AK

---> Sheila Kelly - September 05, 2012 at 15:10:51 recieved fax from Sedgwick Claims Management Services stating the consumer bought the product at the Walmart store. He alleges he picked up the box of rat poison and then touched his face. His eyes, mouth, and nose became irritated and he claims it was from the rat poison box

that he got from the shelf. ---> Sheila Kelly - September 05, 2012 at 15:21:16

Consumer states that he picked up the box of product in the store, and then rubbed his eyes and his face. He said he eyes became very itchy. He rubbed his moustache also. He states he now has a blister on the moustache area.

HE said he DID NOT TOUCH THE PELLETS, only touched the box while at the store, he eyes were burning and his face began burning. He went to the Customer Service desk, adn used the eye wash to rinse his eyes. He washed his face thoroughly with soap and water. His face did not stop burning, and then he felt a burning in his mouth. He took the box home, and states that one of the pellet packets was opened and there were some loose pellets. He put the pellets outside for the rats, as

well as one of the other intact packets. He has one intact packet left. He is unemployed, and on disability due to a work-related injury in 2011 when a metal door fell on his head.

Right now, he says his eyes are burning and his face has burns on it. He wants to see an ophthalmologist today, but wants someone to pay. I explained that we need to investigate this claim. He says he will call Walmart regarding this. I provided my phone # and case #.

---> Sheila Kelly - September 05, 2012 at 15:41:25
Phone call to Sedgwick (1-877-473-1147 x83805) adjuster: Nicole
Knysch. I left a message with my name, 1-800# and work hours.
---> Tammy Karns - September 06, 2012 at 11:10:18

Sheila out, called Sedgwick adjuster, Nicole, I left voice message that based on contact info Sheila had contacted this consumer and he doesn't even have the alleged packaging in question, that without this we can't proceed and the allegation is highly unusual. Left corporate number for her to call back if needed.

---> Sheila Kelly - September 10, 2012 at 10:23:02 Phone call to adjuster Nicole at Sedgewick (1-877-473-1147 x83805). I left a message requesting a return call.

---> Sheila Kelly - September 10, 2012 at 12:43:49
Phone call to consumer: He said he went to the eye doctor last week.
He also said he went to the hospital but did not check in. He is still having problems with eyes. Eye doctor said to keep rinsing eyes with gen-teal solution. He needs to follow-up with eye doctor and ophthalmologist but has no money and no insurance. I explained I will send a HIPPA release to contact HCP and PPL, He is willing to return the box of product. He then said that the doctor he saw did not do a full examination in hi office, but met with him outside the office and recommneded he get genteal drops.

---> Sheila Kelly - September 13, 2012 at 15:06:43 Consumer left a message on after-hours voice mail that he saw an eye doctor. Will await HIPPA release.

---> Tammy Karns - September 14, 2012 at 11:15:14
I called the adjuster and left a detailed message on Sheila's behalf, I also am forwarding the voicemail request from the adjuster and will see what Shelia wants to send in writing to her. I let the adjuster know of our work hours as well and also that Shelia would like to speak to her directly for more information regarding this consumer's

---> Sheila Kelly - September 17, 2012 at 09:10:29
Phone call to adjuster Nicole Knycsch at Sedgewick (1-877-473-1147 x 83805) with my name, 1-800# and work hours, requesting a return call ---> Sheila Kelly - September 20, 2012 at 14:05:16
Phone call to Sedgewick adjuster Nicole: I left a message on answering machine: received an out-of-office message.
---> Sheila Kelly - September 21, 2012 at 14:36:00
Phone call to consumer: he states his eyes are still blurry. He tried

Phone call to consumer: he states his eyes are still blurry. He tried using Visine, but finally went to the eye doctor. He has an appointment today but is going to have to cancel.

He states he was hurt on the job in an unrelated issue, and is waiting for Voc training, but has no medical insurance. He received the paperwork I have sent, but will not send us anything until after we pay his bills. I explained the process, and without the product to send half of the box- cut it in half and keep half. I explained that our Quality dept will not accept anything that has been tampered with. 800000 He says his eyes are not better. His vision is blurry since this incident. He has worn eye glasses for years. 0000 ---> Sheila Kelly - September 21, 2012 at 14:49:25 He then said maybe he will sned us HIPPA release. 0 000 ---> Sheila Kelly - September 24, 2012 at 10:28:42 00000 Received faxed doctor's report dated Septmeber 17,2012. Scanned and attached. 000000 ---> Sheila Kelly - September 25, 2012 at 12:44:13 Spoke with adjuster Nicole. She forwarded me the consumer's "customer Statement". Scanned and attached.

Voluntary Industry Reporting Form for 6(a)(2) Adverse Effects Incident Information Provide all known, required information. If required data field information is unknown, designate as such in appropriate area Page 1 of 3

Row 1 Administrative	Reporter Name		Submission date. Contact person (if different date.		n (if different than reporter)	Internal ID 1041470	
Data							
	Address			Address		000000	
	Ligonier, PA 15658 USA						
	Phone #		Phone #			0000	
	Incident Status: New	Location and Ligonier, PA USA 09/07/2012	Date registrant became aware of incident. 09/14/2012			of larger study?	
Row 2 Pesticide(s) Involved	EPA Registration # (Pr 3282-74	n # (Product 1) EPA Registration # (EPA Registration #		
mvorved	A.I. (s) Brodifacoum		A.I. (s)		A.I. (s)		
	Product 1 name d-CON Bait Pellets II		Product 2 Name		Product 3 Name		
	Exposed to concentrate prior to dilution? No		Exposed to concentrate prior to dilution?		Exposed to concendilution?	Exposed to concentrate prior to dilution?	
	Formulation solid		Formulation		Formulation		
Row 3 Incident Circumstances	Evidence label directions were not followed? No Intentional misuse?	yard, school, nursery/gree commercial woods, agric	: (examples inclu , industrial, nhouse, surface v turf, building/offi sultural (specify c ility, highway)).	vater, ice, forest/	Situation (act of using pro- include mixing/loading, re- transportation, repair/ mai- application equipment, ma formulating). See Incident Description	entry, application, intenance of inufacturing/	
	Applicator certified? UNK	Own Reside					
	How exposed: (examples include direct contact with treated surface, ingestion, spill, drift, runoff) See Incident Description Notes		REVIEY DATE: 10-29	VED FOR 6(a)	2 : AK_		

Voluntary Industry Reporting Form for 6(a)(2) Adverse Effects Incident Information

Provide all known, required information. If required data field information is unknown, designate as such in appropriate area

Page 2 of 3

Brief description of incident circumstances.

Swedlund, Christy Sep 14 2012 12:04PM warm transfer from Emma

Hx: Caller states that the product was set out behind the refrigerator, in the living room and in her bedroom. Arogai the same time the product was set out, she developed an ulcer in her mouth. MD states that the ulcer is caused by acid reflux. She is asking if the product dust could have caused her mouth ulcer. She is sure she has not ingested any of the product or even touched it.

A: This is a LAAC. A person would need to ingest approximately 25g of the product before we would need to worry about s/sxs developing. There has not been any contact with this product. Mouth ulcer would not be expected from having the product in your home. Discussed LAAC s/sxs; spontaneous nose bleeds, small cuts that continue to bleed, blood in urine/stool. We would not expect any sxs from the exposure. VIT K1 is the antidote. Callback 24/7 if you have any other questions or concerns.

0 0 0 0 0

00000

Voluntary Industry Reporting Form for 6(a)(2) Adverse Effects Incident Information Provide all known, required information. If required data field information is unknown, designate as such in appropriate area Page 3 of 3

Demographic information: Age: 47 Year(s) Sex: Female Occupation (if relevant) NA	Exposure route: Unknown route	Was adverse effect result of suicide/homicide or attempted suicide/homicide?	Was protective clothing worn (specify)? None Reported
If female, pregnant? No	Was exposure occupational? Not indicated If yes, days lost due to illness: NA	Time between exposure and onset of symptoms: Unable to determine	0 000
Type of medical care sought: (examples include none, clinic, hospital emergency department, private physician, PCC, hospital inpatient). ER/Hospital-treated & released Exposure data: NA Amount of pesticide: NA	List signs/symptoms/adverse effi Gastrointestinal-Nausea Gastrointestinal-Oral ulcer	ects	If lab tests were performed, solist test names and results (If available, submit reports) None Reported
Exposure duration: Acute < 8hrs Patient weight: Unknown			*
Human severity category: HC			
necessary)			
	*		
, .	3		
			Internal ID # 1041470